



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 22, 2020

USDC SDNY

DOCUMENT

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DATE FILED: 12/22/20

MEMO ENDORSED

BYCM/ ECF

The Honorable Kimba M. Wood
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Timothy Mitchell and Tyrone Thurmond, 20 Cr. 504 (KMW)

Dear Judge Wood:


The Government respectfully submits this letter to request the Court, with consent of the defendants, to adjourn the status conference currently scheduled in this case for January 12, 2021 for a period of 60 days. The Government produced discovery to Timothy Mitchell in October 2020 and to Tyrone Thurmond in November 2020. Counsel for both defendants have related to the Government that they require more time to review the discovery before setting a motions schedule in this case. The Government also respectfully moves to exclude time under the Speedy Trial Act from January 12, 2021 through the next scheduled conference, so that the defendants can continue to review the discovery and engage in any discussions regarding pretrial dispositions. The Government believes that an exclusion of time is in the interest of justice. The defendants consent to the exclusion.

*The conference is
adjourned to March 23,
2021, at 11:00 a.m.*

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

by:


Andrew Chan
Christopher Clore
Ni Qian
Assistant United States Attorneys
(212) 637-1072/1063/2364

cc: Counsel for Timothy Mitchell and Tyrone Thurmond

SO ORDERED: N.Y., N.Y. 12/22/20

Kimba M. Wood

KIMBA M. WOOD
U.S.D.J.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK


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	:	
UNITED STATES OF AMERICA	:	
	:	PROPOSED ORDER
- v. -	:	
	:	20 Cr. 504 (KMW)
TIMOTHY MITCHELL,	:	
TYRONE THURMOND,	:	
	:	
Defendants.	:	
-----	X	
KIMBA M. WOOD, United States District Judge:		

Upon the application of the United States of America, by and through AUDREY STRAUSS, Acting United States Attorney for the Southern District of New York, ANDREW CHAN, CHRISTOPHER CLORE, and NI QIAN, Assistant United States Attorneys, of counsel, and with the consent of TIMOTHY MITCHELL, by and through his attorneys Peter Quijano, Anna Sideris, and Megan Wall-Wolff, and TYRONE THURMOND, by and through his attorney Xavier Donaldson, it is hereby ORDERED that time from January 12, 2021 through

March 23 2021, is excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A).

The Court finds that the ends of justice served by granting a continuance outweigh the best interest of the public and the defendant in a speedy trial because it will permit the parties to continue to discuss a pretrial resolution of this matter.

Dated: New York, New York
22nd of December, 2021



THE HONORABLE KIMBA M. WOOD
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK